



May 5, 2025

VIA PACER E-FILING

Hon. Arun Subramanian, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

Re: *Jane Doe #1, et al. v. Government of the U.S. Virgin Islands, et al.*, 1:23-cv-10301-AS

Dear Hon. Judge Subramanian:

I am counsel for Plaintiffs in the above matter. As this Court is aware, Plaintiffs have moved for relief pursuant to FRCP 54(b). As of this date, Governor de Jongh and Cecile de Jongh have opposed the application, while this Court granted a two-week extension to the USVI.

During the pendency of this action, this Court has permitted Plaintiffs to file an omnibus response to the multiple sets of opposition papers filed by Defendants. In the interest of economy, Plaintiffs renew this request with respect to the pending motion and request leave to file a single omnibus reply to the opposition papers filed herein.

Additionally, in accordance with this Court's Rule 3.E., Plaintiffs respectfully makes this first request for an extension of time to file the omnibus reply, from May 17, 2025 until May 23, 2025. This is the first request for such relief.

Respectfully Submitted,

/s/ Jordan Merson
Jordan K. Merson